

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Thomas A. Jacobson	:	
Joye L. Jacobson	:	Chapter 13
Debtor	:	
	:	Case No. 1:20-00436
Deutsch Bank National Trust Company, as Trustee,	:	
On behalf of the Holders of J.P. Morgan Mortgage	:	
Acquisition Trust 2007-CH3 Asset Backed Pass-	:	
Through Certificates, Series 2007-CH3	:	
	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Thomas A. Jacobson	:	
Joye L. Jacobson	:	
	:	
Respondents	:	
and	:	
Charles J. Dehart, III	:	
	:	
Trustee	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 8th day of December, 2020, comes the respondents, Thomas A. Jacobson and Joye L. Jacobson, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The exhibits speak for themselves.
5. Denied.
6. Admitted.

7. It is admitted that the Debtors have failed to make certain post-petition mortgage payments because of some financial difficulties.
8. Denied. The Debtors admits that they are currently obligated but is uncertain as to the exact amount of the loan post- petition amount. Debtors wish to discuss entering into a Stipulation to resolve any delinquency and seek a loan modification.
9. Denied. Debtor is without knowledge as to the principal balance due on the loan.
10. Denied. The averments of Paragraph 10 constitute conclusions of law to which no response of pleading is required.
11. Denied. Debtor is without knowledge as to whether, and to the extent which, Movant has incurred legal expenses.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,
CGA Law Firm

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
Counsel for Debtor
135 North George Street
York, PA 17401
(717) 848-4900

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Charles J. Dehart, III	:	
	:	
Trustee	:	
Respondent	:	

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2020, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire
Chapter 13 Trustee
ECF

James C. Warmbrodt, Esquire
KML Law Group
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire